

# EXHIBIT D

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**From:** Reynolds, Tina  
**Sent:** Friday, August 25, 2006 3:55 PM  
**To:** 'Beth Fegan'  
**Cc:** DeLancey, Merle; Patel, Shamir; Jackson, Andrew  
**Subject:** RE: Baxter documents on Lextranet

Beth - You asked me to help you fix this problem so I did. I don't see how anything Lextranet has given us is work product. If you were inspecting documents in our physical warehouse versus our electronic warehouse, we would know the names of the people who have access. Further, the only reason Lextranet gave us the name was because the person was not an authorized user. It is for your own protection as well as ours that not just anyone be permitted to access the system. You have known about this system since May 26. It would be unduly burdensome and expensive to change paths now. I will be on vacation starting tomorrow, so if you need anything further on this issue please copy the gentlemen on the email. Thanks. Tina

**Tina Reynolds**  
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Tel (202) 420-4114 | Fax (202) 420-2201  
[ReynoldsT@dicksteinshapiro.com](mailto:ReynoldsT@dicksteinshapiro.com)

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**From:** Beth Fegan [<mailto:beth@hbsslaw.com>]  
**Sent:** Friday, August 25, 2006 3:33 PM  
**To:** Reynolds, Tina  
**Cc:** DeLancey, Merle; Patel, Shamir; Jackson, Andrew  
**Subject:** RE: Baxter documents on Lextranet

I disagree with Lextranet's representations to you. In any event, for the very reasons set forth in your email, we will no longer use Lextranet. Just as I am not entitled to know the names of your contract attorneys or when Tina Reynolds did what, the same confidentiality should apply to plaintiffs. Please produce all responsive documents on disk. Or agree that Lextranet will not share with you Plaintiffs' work product. Beth

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**From:** Reynolds, Tina [<mailto:ReynoldsT@dicksteinshapiro.com>]  
**Sent:** Friday, August 25, 2006 2:22 PM  
**To:** Beth Fegan  
**Cc:** DeLancey, Merle; Patel, Shamir; Jackson, Andrew; Reynolds, Tina  
**Subject:** RE: Baxter documents on Lextranet

Beth - It appears that your access issue was really a security settings issue. In order to resolve the issue, I checked with Lextranet and learned the following. It

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appears that you accessed the system once on June 23 and again on August 23, when one of your contract attorneys (Annette Collins) contacted Lextranet tech support. Since you are the only registered user for your firm, Lextranet will ordinarily not give out information to others, such as Ms. Collins, calling on your behalf. It is apparently a violation of the Lextranet licensing agreement for you to share your password with others. If you are going to use contract attorneys to review these documents you must obtain individual user i.d.s and passwords for each contract attorney. Our May 26, 2006 letter outlined the details on that process.

Lextranet indicated that the simple fix required only the resetting of your security and took less than 10 minutes. We have verified that the issue has been resolved.

Please call or email if you have any further questions.

**Tina Reynolds**

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1825 Eye Street NW | Washington, DC 20006  
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**From:** Beth Fegan [<mailto:beth@hbsslaw.com>]  
**Sent:** Friday, August 25, 2006 12:57 PM  
**To:** Reynolds, Tina  
**Cc:** DeLancey, Merle; Patel, Shamir  
**Subject:** RE: Baxter documents on Lextranet

Tina -- I just wanted to follow up and let you know that we are still not able to see any documents. A techie today said that it appears the documents are not loaded. Strange. Anyway, we still can't access. I suggest you provide the documents on disks so we can get through this sooner than later. Beth

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**From:** Reynolds, Tina [<mailto:ReynoldsT@dicksteinshapiro.com>]  
**Sent:** Friday, June 23, 2006 3:12 PM  
**To:** Beth Fegan  
**Cc:** DeLancey, Merle; Patel, Shamir; Reynolds, Tina  
**Subject:** RE: Baxter documents on Lextranet

Beth - This is the response that I received from our Lextranet contact. If this does not address your concern please let me know and I will contact Lextranet myself and have someone get in touch with you directly. We did have someone go into the system using your log in to confirm that it is fully operational. Have a good weekend.  
Tina

There is a plug-in called quick view plus, I think, that Lextranet requires you to download from their web site.

Someone in Lextranet tech support would be able to walk them through that process.

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**From:** Beth Fegan [mailto:beth@hbsslaw.com]  
**Sent:** Friday, June 23, 2006 2:30 PM  
**To:** Beth Fegan; Reynolds, Tina  
**Cc:** DeLancey, Merle  
**Subject:** RE: Baxter documents on Lextranet

Also, FYI, I am allowed to see detail but not the documents themselves on the Lextranet. How can this be fixed?

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**From:** Beth Fegan  
**Sent:** Friday, June 23, 2006 1:25 PM  
**To:** 'Reynolds, Tina'  
**Cc:** DeLancey, Merle  
**Subject:** Baxter documents on Lextranet

Will you please advise of the exact number of pages available on the Lextranet as of today?

Thanks,  
Beth

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